



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

CRH/JMH/EHS
F. #2017R00906

*271 Cadman Plaza East
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January 14, 2022

By Email, USAFx and FedEx

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Court Plaza South
21 Main Street, Suite 305-A
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Re: United States v. Michael McMahon
Criminal Docket No. 21-265 (PKC)

Dear Counsel:

Enclosed please find the following additional materials, which are being produced in accordance with the government's discovery obligations:

Description	Begin Bates	End Bates
Media reports related to Operation Fox Hunt	MM-004292	MM-004314
Select records from previously produced search warrant returns	MM-004315	MM-004470
Facebook records and data	MM-004471	MM-004479
Facebook records and data	MM-005056	MM-005056
Facebook records and data	MM-005057	MM-005057

Description	Begin Bates	End Bates
Capital One records	MM-004480	MM-004658, MM-005066
TD Bank records	MM-004659	MM—005055
AT&T records	MM-005058	MM-005058
AT&T records	MM-005059	MM-005059
Locus records	MM-005060	MM-005060
Verizon records	MM-005061	MM-005061
Google records	MM-005062	MM-005062
Google records	MM-005063	MM-005063
Forensic report of mobile device	MM-005064	MM-005064
Data from extraction of mobile device	MM-005065	MM-005065

The materials are being provided subject to the protective order agreed to by the parties and entered by the Court on June 18, 2021. See ECF No. 70 (“the Protective Order”). The government considers all of the materials produced today to constitute “sensitive discovery material” as that term is defined in the Protective Order, and has identified such materials accordingly. See Protective Order ¶¶ 7-9. The government reiterates its request for reciprocal discovery from the defendant.

Very truly yours,

BREON PEACE
United States Attorney

By: /s/ Craig R. Heeren
Craig R. Heeren
J. Matthew Haggans
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Enclosures (via USAFx)

cc: Clerk of the Court (PKC) (by ECF) (without enclosures)